

HUESTON HENNIGAN LLP
John C. Hueston, State Bar No. 164921
jhueston@hueston.com
Douglas J. Dixon, State Bar No. 275389
ddixon@hueston.com
620 Newport Center Drive, Suite 1300
Newport Beach, CA 92660
Telephone: (949) 229-8640

HUESTON HENNIGAN LLP
Joseph A. Reiter, State Bar No. 294976
jreiter@hueston.com
Christine Woodin, State Bar No. 295023
cwoodin@hueston.com
Michael K. Acquah, State Bar No. 313955
macquah@hueston.com
William M. Larsen, State Bar No. 314091
wlarsen@hueston.com
Julia L. Haines, State Bar No. 321607
jhaines@hueston.com
523 West 6th Street, Suite 400
Los Angeles, CA 90014
Telephone: (213) 788-4340

Attorneys for Plaintiffs Match Group, LLC;
Humor Rainbow, Inc.; PlentyofFish Media ULC;
and People Media, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

**IN RE GOOGLE PLAY STORE
ANTITRUST LITIGATION**

Case No. 3:21-md-02981-JD

THIS DOCUMENT RELATES TO:

*Match Group, LLC, et al. v. Google LLC,
et al.*, Case No. 3:22-cv-02746-JD

**[PROPOSED] ORDER RE: RESPONSE TO
DEFENDANTS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL SHOULD
BE SEALED RELATING TO DEFENDANTS'
ANSWER, DEFENSES, AND
COUNTERCLAIMS TO MATCH GROUP'S
COMPLAINT [DOCKET No. 282]**

Judge James Donato

Having considered Defendants Google LLC, Google Ireland Limited, Google Commerce
Ltd., Google Asia Pacific Pte. Ltd., and Google Payment Corp.'s (collectively, "Google")
Administrative Motion to Consider Whether Another Party's Material Should Be Sealed Relating to

Defendants' Answer, Defenses, and Counterclaims to Match Group's ("Match") Complaint ("Motion to Seal"), the Declaration of Adrian Ong in Response to Defendants' Administrative Motion, and any materials submitted in support or in opposition thereto, pursuant to Local Rules 7-11 and 79-5;

IT IS HEREBY ORDERED:

The following paragraphs of Defendants' Answer, Defenses, and Counterclaims to Match's Complaint may be filed under seal:

Portion Containing Designated Information	Designating Party	Reason(s) for Sealing Request	Ruling
Intro. to Answer	Match	The information in this paragraph includes Match Plaintiffs' assessment of the future value of subscriptions on a particular platform, which Match Plaintiffs consider confidential and proprietary business information and which would give Match Plaintiffs' competitors insights into potential vulnerabilities within Match Plaintiffs' services.	
¶ 31	Match	The information in this paragraph includes detailed figures on the spending patterns of Match Plaintiffs' users, which Match Plaintiffs consider confidential and proprietary business information and which would place Match Plaintiffs at a competitive disadvantage if revealed.	
¶ 33	Match	The information in this paragraph includes detailed figures on the spending patterns of Match Plaintiffs' users, which Match Plaintiffs consider confidential and proprietary business information and which would place Match Plaintiffs at a competitive disadvantage if revealed.	
¶ 34	Match	The information in this paragraph includes the monthly active users (MAUs) on particular platforms for particular brands as well as other detailed information on Match Plaintiffs' users, which Match Plaintiffs consider confidential and	

		proprietary business information and which would give Match Plaintiffs’ competitors unfair insights into the business.	
¶ 38	Match	The information in this paragraph includes Match Plaintiffs’ assessment of the future value of subscriptions on a particular platform, which Match Plaintiffs consider confidential and proprietary business information and which would give Match Plaintiffs’ competitors insights into potential vulnerabilities within Match Plaintiffs’ services.	

Dated: _____, 2022

Honorable James Donato
United States District Court
Northern District of California